

**REMARKS**

Claims 1-27 remain pending in the application.

**Claims 1-27 over DiFrancisco in view of Watson**

In the Office Action, claims 1-27 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over publication "Global Broadcast Service (GBS) End-To-End Services: Protocols and Encapsulation", by Michael DiFrancisco et al., IEEE (2000), hereinafter "DiFrancisco" in view of U.S. Patent Application Pub. No. 2003/0121047 to Watson et al. ("Watson"). The Applicant respectfully traverses the rejection.

Claims 1-27 recite a method and system to receive a voice stream from a telephony device at a data router, the data router being adapted to receive **any of voice-over-IP (VoIP), voice-over-frame relay (VoFR), and voice-over-ATM (VoATM)** communications, and to encrypt the voice stream into a serial data stream.

DiFrancisco is a white paper that attempts to describe a global broadcast service (GBS). DiFrancisco's Figure 2, on the cited page 705, shows an overview of the services to be offered by the GBS system. This is an important Figure to this paper, and the Examiner is respectfully asked to carefully re-review it.

In particular, Figure 2 is meant to be read from the top down. The top half of the figure summarizes the "Transmit Suite" layers, and the lower half summarizes the "Receive Suite" layers. For example, the very top layer of the Transmit Suite is labeled "Transmit Suite Inputs". This would depict all inputs to the GBS. From that layer, the input may be passed to the IP layer (on the left portion of the figure 2), through an Asynchronous EIA-423 layer, through a synchronous EIA-422 layer, formatted into NTSC video, or RGB video. As taught by DiFrancisco, serial data would pass through either the EIA-423, EIA-422, NTSC or RGB layers. The output of the "Serial Service" layer or the "Video/Audio Service" layer is injected directly into the MPEG-2 layer, to the DVB layer, and transmitted via the "RF Waveform" layer.

Francisco fails to teach use of **any of** voice-over-IP (VoIP), voice-over-frame relay (VoFR), and voice-over-ATM (VoATM) communications at all, much less disclose, teach or suggest a router that is adapted to receive **any of** voice-over-IP (VoIP), voice-over-frame relay (VoFR), and voice-over-ATM (VoATM) communications; and encrypting the voice stream into a serial data stream, as recited by claims 1-27.

As the Examiner points out in the Office Action, Watson's teachings are directed toward direct to home (DTH) satellite transmissions in paragraph 22 (see Office Action, pages 4 and 5). "A movie file stored in MPEG format may then be packaged for DTH satellite broadcast by encapsulating the file in a DVB compliant spooler file which may then be routed through a transport multiplexor that applies real-time broadcast conditional access." (see Watson, paragraph 22). A thorough reading of Watson fails to provide any teachings directed toward a data router that is adapted to receive **any of** voice-over-IP (VoIP), voice-over-frame relay (VoFR), and voice-over-ATM (VoATM) communications, much less to encrypt the voice stream into a serial data stream, as recited by claims 1-27.

Francisco in view of Watson, either alone or in combination, would still fail to disclose, teach or suggest a method and system to receive a voice stream from a telephony device at a data router, the data router being adapted to receive **any of** voice-over-IP (VoIP), voice-over-frame relay (VoFR), and voice-over-ATM (VoATM) communications, much less to encrypt the voice stream into a serial data stream, as recited by claims 1-27.

A benefit of a method and system to receive a voice stream from a telephony device at a data router, with the data router being adapted to receive **any of** voice-over-IP (VoIP), voice-over-frame relay (VoFR), and voice-over-ATM (VoATM) communications is, e.g., increased flexibility. In many instances a user of an encryption device has no control over the types of communication protocols that are available for input thereto. Through use of a router that can receive **any of** a variety of protocols, i.e., voice-over-IP (VoIP), voice-over-frame relay (VoFR), and voice-over-ATM (VoATM), the user is given greater flexibility as to the type of voice communication device that can be connect to an encryption

device. The cited prior art fails to disclose, teach or suggest the claimed features having such benefits.

For at least these reasons, claims 1-27 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



William H. Bollman

Reg. No.: 36,457

Tel. (202) 261-1020

Fax. (202) 887-0336

**MANELLI DENISON & SELTER PLLC**

2000 M Street, NW 7<sup>TH</sup> Floor

Washington, DC 20036-3307

TEL. (202) 261-1020

FAX. (202) 887-0336

WHB/df